

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

The Barry White Family Trust U/A/D,  
Plaintiff,

v.

Joe Cooley, Rodney David Oliver p/k/a Rodney-O, et al.,  
Defendants.

Case No. 1:24-cv-07509-DLC

**DECLARATION OF RODNEY DAVID OLIVER**

REGARDING DISCOVERY COMPLIANCE, REQUEST TO FILE DOCUMENTS UNDER  
SEAL, AND REQUEST FOR CLARIFICATION ON SUMMARY JUDGMENT PROCEDURE

I, Rodney David Oliver, declare under penalty of perjury:

1. I am a pro se defendant in this action and submit this declaration in response to the Court's July 17, 2025 Order (Dkt. 134), and to address three matters: (a) the status of my discovery compliance, (b) a request to submit certain documents under seal, and (c) a request for clarification regarding the defendants' ability to move for summary judgment.

2. I have made a diligent and sincere effort to comply with the plaintiff's discovery requests. I produced all documents in my possession and answered all interrogatories truthfully to the best of my memory.

3. As part of my effort, I took the time to learn how to properly format and organize discovery in a manner consistent with the plaintiff's expectations, including:

- Applying Bates numbering to documents,
- Preparing a production log and index,
- Ensuring accuracy and clarity in what I submitted.

4. My delay was not due to negligence or bad faith, but rather out of respect for the process and a desire to comply in a complete and organized manner, while also doing my best to preserve any valid defenses I may have.

5. I also communicated with the plaintiff regarding my discovery efforts and timeline, and was surprised to learn she represented otherwise to the Court. This communication is reflected in the joint letter we submitted, which outlined the parties' respective positions and ongoing efforts. I submit this declaration to ensure the record accurately reflects my good faith participation and ongoing compliance with discovery obligations.

6. To support my continuing objection to the plaintiff's standing, I intend to submit documents including:

- The Withdrawal of Separate Property,
- Relevant registration certificates,
- The Settlement Agreement.

7. These materials are directly relevant to whether the Barry White Family Trust has a valid chain of title to assert the claims in this case. Some of these documents have been marked 'CONFIDENTIAL' under the Protective Order.

8. While I believe some of these confidentiality labels may be being used in a way that discourages full transparency, I do not wish to violate the Protective Order or Local Rule 79.5.

9. Therefore, I respectfully ask the Court for time to learn how to properly file these materials under seal in accordance with the applicable rules. Alternatively, if the Court is able to provide any guidance or clarification as to whether these documents — including the Withdrawal of Separate Property, registration certificates, and the Settlement Agreement — qualify for confidential treatment, I would greatly appreciate the direction. I want to ensure full compliance while also presenting the information necessary to support my defense.

10. As a pro se party, I wish to ensure I do not proceed improperly or outside the Court's intended timeline. If the plaintiff does not move for summary judgment, I respectfully request that the Court permit the defendants to do so under the same reasoning the Court provided to the plaintiff — specifically, to test whether the plaintiff has sufficient evidence to prevail on its claims, including its standing to bring them, and whether certain claims fail as a matter of law.

11. I remain committed to fully complying with all future orders of this Court and to defending myself honestly and respectfully.

Respectfully submitted,  
Rodney David Oliver  
Pro Se Defendant  
11074 Oso Drive  
Chatsworth, CA 91311  
Dated: July 18, 2025

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Barry White Family Trust U/A/D December 19, 1980,  
Plaintiff,

v.

Rodney David Oliver,  
Defendant.

Case No. 1:24-cv-07509 (DLC)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 11, 2025, I caused a true and correct copy of the attached Letter and Declaration of Rodney David Oliver, to be served via email upon the following:

Dorothy M. Weber, Esq.  
Shukat Arrow Hafer Weber & Herbsman, LLP  
494 8th Avenue, Suite 600  
New York, NY 10001  
Email: dorothy@musiclaw.com

Judith Ann Meyers, Pro Se  
Barry White Family Trust U/A/D December 19, 1980  
Email: jameyers68@gmail.com

Joe Cooley, Pro Se  
248 E 157th Street  
Gardena, CA 90248  
Email: cooleyjoe011@gmail.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,

/s/ Rodney David Oliver  
Rodney David Oliver (Pro Se Defendant)  
11074 Oso Avenue  
Chatsworth, CA 91311  
rodneyolivermusic@gmail.com

Dated: July 18, 2025